



Clearwater Paper Corporation
601 West Riverside, Suite 1100
Spokane, WA 99201

February 3, 2014

Zach Hedgpeth, P.E.
Roylene Cunningham
Air Pollution Control Technology & Emission Testing
Office of Environmental Assessment
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Re: Clearwater Paper Corporation Pre-Test Feasibility Study

Dear Zach:

On July 19, 2013, EPA issued an information request to Clearwater Paper Corporation (Clearwater) requiring sampling of process gas streams moving through the M&D digester systems at Clearwater's Lewiston, Idaho paper mill. On October 17, 2013, Horizon Engineering submitted a test plan to EPA, on behalf of Clearwater. Subsequently, on November 15, 2013, Horizon Engineering communicated to EPA technical and safety concerns related to the testing. EPA requested that Horizon Engineering and Clearwater conduct a pre-test feasibility evaluation during the week of December 2, 2013 (previously scheduled as the sampling week), and EPA requested a pre-test feasibility field plan from Horizon before on-site activity commenced. The pre-test feasibility field plan was promptly submitted to EPA by Horizon Engineering on November 25, 2013. The enclosed pre-test feasibility study was prepared by Horizon Engineering in accordance with EPA's request and schedule.

EPA observed the pre-test feasibility evaluation and conducted an inspection in Lewiston, Idaho during the week of December 2, 2013. As described in the enclosed study, observations revealed that multiple ports installed to conform to EPA's information request are unsuitable for sampling due to steam saturation and debris clogging. In some cases, special ports were installed that required additional protective gear to protect Horizon's personnel. In other cases, modifications to EPA test methods (e.g., Method 308, Method 1A) were necessary to adjust for high moisture, debris clogging (liquor and sawdust), and steam. Our understanding is that EPA's observations led to the decision not to require sampling at process locations 3 and 4. These circumstances reaffirm Clearwater's objections to EPA's information request and process gas sampling that were set forth in our letter dated August 23, 2013.

In spite of these challenges and the unsuitability of testing locations required by EPA's information request, Horizon captured results for methanol from sample point 1a on M&D digester No. 1. This location represents the exhaust gas from the M&D digester to the bottom of the Kone Bin. Results of the sample from 1a were 0.00061 lb/ton of methanol - representing

approximately 100 pounds *per year* of methanol subject to control by the Kone bins. Even if the Kone bins provided no control, this represents a de minimus level of HAP/VOC emissions.

EPA's position in the enforcement action against Clearwater related to the NESHAP allegations is, succinctly, that additional hazardous air pollution control is required for the digester systems, unless each system meets the criteria of EPA's guidance document dated March 31, 2000, question 9. EPA narrowly focuses on one element of that guidance criteria, specifically the concentration of methanol in the steam, notwithstanding that the derivation of this guidance value (0.0018 lb/ton methanol) is neither documented nor tested.

Clearwater does not agree with EPA's regulatory conclusions presented in the enforcement action and has repeatedly demonstrated to EPA the systems' conformity with EPA's guidance criteria (fresh pocket purge steam, introduction of the remaining contaminated pocket steam near the bottom of the chip bin, and chip bin level greater than 10 feet). Now, the results of Horizon's sampling port 1a directly address EPA's specific element and indicate that the methanol concentrations in the Lewiston digester systems are significantly lower than the guidance value emphasized by EPA. Accordingly, further sampling and process data gathering is unwarranted.

Based upon our initial objections to EPA's scope of the information request requiring sampling of process gas not emissions, upon the field conditions observed by EPA and Horizon causing atypical adjustments to sample equipment and EPA methods, and upon the results from sample port 1a, Clearwater respectfully requests that EPA determine that the information request is fulfilled, that further testing is unjustified, and that further process data gathering is unnecessary. Please note that on pages 11 and 33 of the study Horizon observes that sample port 1b is steam saturated. Consequently, sampling exhaust gas from the M&D digester No. 2 to the bottom of that Kone Bin is infeasible.

Clearwater remains committed to resolving the pending enforcement action cooperatively. Additional process gas sampling is unlikely to provide any additional valuable information for these negotiations, however. Clearwater will not schedule any further testing by Horizon until EPA reviews and responds to this feasibility study.

Sincerely,



Marvin A. Lewallen
Vice President -- Environment, Energy & Sustainability

cc: Elizabeth Loeb, US Department of Justice
Julie Vergeront, US Environmental Protection Agency, Region 10
Lisa Carlson, Idaho Department of Environmental Quality